

# WILLKIE FARR & GALLAGHER<sub>LLP</sub>

787 Seventh Avenue  
New York, NY 10019-6099  
Tel: 212 728 8000  
Fax: 212 728 8111

July 10, 2025

## VIA ECF

The Honorable Robert W. Lehrburger  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

Re: PDV USA, Inc. v. Interamerican Consulting, Inc., No: 1:20-cv-03699-JGK-RWL (S.D.N.Y.)

Dear Judge Lehrburger:

We represent PDV USA, Inc. (“PDV USA”) in the above-captioned matter. We write in reference to the sealing of certain exhibits quoted in and attached to PDV USA’s Renewed Motion to Sanctions. *See* ECF Nos. 265, 266.

Some of the sealed exhibits (Exs. 1–4, 7, 40–46, 49) are sealed by previous order of this Court and therefore PDV USA understands that no further action is required to maintain those exhibits under seal. ECF 223. Other exhibits, however, are not the subject of the Court’s prior sealing order. Exs. 5, 8, 9, 30, 32–34, 36–38. With respect to these exhibits, PDV USA has met and conferred with counsel for defendant Interamerican Consulting, Inc. (“Interamerican”)—the party who produced the exhibits to PDV USA in discovery—who has taken the position that the exhibits should remain under seal.

PDV USA also met and conferred with counsel for the United States, which originally produced the documents in question to Interamerican’s owner David Rivera in the criminal matter. Counsel for the government has informed PDV USA that it is continuing to review whether or not it will file a motion to seal with this Court. The government requests that the Court extend the deadline to file a motion to maintain certain exhibits under seal (if any) to August 6, 2025. The exhibits at issue are Exhibits 5, 8, 9, 30, 32–34, 36–38 to the Declaration of Brady M. Sullivan in Support re: Renewed Motion for Sanctions (as well as redacted references thereto in the memorandum of law). PDV USA does not oppose the United States’ request.

Respectfully submitted,

WILLKIE FARR & GALLAGHER LLP

By: /s/ Brady M. Sullivan

Jeffrey B. Korn  
Brady M. Sullivan  
787 Seventh Avenue  
New York, NY 10019  
(212) 728-8000  
JKorn@willkie.com  
BSullivan@willkie.com

Michael J. Gottlieb  
1875 K Street, N.W.  
Washington, D.C. 20006  
(202) 303-1000  
MGottlieb@willkie.com

*Attorneys for Plaintiff*

cc: All counsel of record (by ECF)